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12 *Proposed Attorneys for Debtors  
and Debtors in Possession*  
13

14 **UNITED STATES BANKRUPTCY COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

21 **Debtors.**

22 Bankruptcy Case No. 19-30088 (DM)

23 Chapter 11

24 (Lead Case)

25 (Jointly Administered)

26 **STIPULATION BETWEEN DEBTORS  
AND CERTAIN WILDFIRE CLAIMANTS  
EXTENDING TIME TO RESPOND TO  
MOTION TO APPROVE SHORT-TERM  
INCENTIVE PLAN**

27 [Re: Dkt No. 782]

28 [No Hearing Requested]

29  
30  Affects PG&E Corporation  
31  Affects Pacific Gas and Electric Company  
32  Affects both Debtors

33 \*All papers shall be filed in the lead case,  
34 No. 19-30088 (DM)

This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”), on the one hand, and the 3,500 individuals represented by Singleton Law Firm, APC who have asserted claims against the Debtors (collectively, the “**SLF Wildfire Claimants**”) on the other. The Debtors and the SLF Fire Victim Claimants are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

## RECITALS

A. On March 6, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C. §§ 105(a), 363, and 503(c) for Entry of an Order Approving (I) Short-Term Incentive Plan and (II) Granting Related Relief* [Dkt No. 782] (the “**STIP Motion**”), which is set for a hearing before the Court at 9:30 a.m. on April 9, 2019. Any response or opposition to the STIP Motion is due by 4:00 p.m. (Pacific Time) March 20, 2019.

B. Counsel for the SLF Wildfire Claimants has requested, and proposed counsel for the Debtors has agreed, that the time for the SLF Wildfire Claimants to respond to the STIP Motion be further extended.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT:

1. The time for the SLF Wildfire Claimants to file and serve any response or opposition to the STIP Motion is extended through 4:00 p.m. (Pacific Time) on March 28, 2019.

[Signatures on next page]

1 Dated: March 22, 2019  
2 KELLER & BENVENUTTI LLP  
3

4 */s/ Jane Kim*  
5 Jane Kim  
6 *Proposed Attorneys for Debtors*  
7 *and Debtors in Possession*

8  
9  
10 Dated: March 22, 2019  
11 SULLIVAN HILL REZ & ENGEL  
12 A Professional Law Corporation  
13

14 */s/ Christopher V. Hawkins*  
15 James P. Hill  
16 Christopher V. Hawkins  
17 Jonathan S. Dabbieri  
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*Attorneys for the SLF Wildfire Claimants*